

# Privacy Policy for the Volkswagen ID

This Privacy Policy sets out important information about your rights in relation to the processing of your personal data, and the basis upon which any personal data we collect from you, or that you provide to us, will be processed in connection with your use of Volkswagen ID. We do not knowingly attempt to solicit or receive information from children.

Kindly note, that we - as a German company - are bound by German law including the regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("**GDPR**") even when we process personal data of data subjects permanently residing outside Germany. You can find the information regarding the processing of your data required by German law and the GDPR in **Part I** of this Privacy Policy.

Beside of that, we may also be bound by national laws of other countries to a certain extent. If you permanently reside in a country named in **Part II** of this Privacy Policy you can find additional information there.

## Part I

### A. Controller

With this Privacy Policy, we inform you about the processing of your personal data by Volkswagen AG, Berliner Ring 2, 38440 Wolfsburg, e-mail: [vw@volkswagen.de](mailto:vw@volkswagen.de), registered in the commercial register of the Braunschweig District Court, registration number HRB 100484 ("**Volkswagen AG**", "**we**", "**our**" or "**us**"), when using the central user account "Volkswagen ID" ("**Volkswagen ID**").

Under this Privacy Policy, and unless we have entered into a different arrangement with you, we are what's known under the GDPR as the "controller" of the personal data you provide to us. We are a "controller" as we control personal data provided to us by our employees and clients; and we decide on the purpose and means of processing this personal data.

### B. Processing of your personal data

#### I. Processing of protocol data on the website

If you just visit the Volkswagen ID landing page without registering or logging in, we only process the following log data:

- Your IP address,
- The operating system and web browser you are using and the screen resolution you have set, and
- The date and time of your visit.

We process this data on the basis of Art. 6 (1) point (f) of GDPR due to our legitimate interest in being able to properly display the website to you. We will store the log data for a period of one month. After that period the personal data will be deleted.

## II. Cookies

We use various cookies on our websites. Cookies are small files containing configuration information that are stored on your end device. Cookies can basically be divided into three categories. There are cookies which are essential for the functionality of the website (so-called functional cookies), cookies which increase the level of comfort when visiting a website, for example, save your language settings (so-called comfort cookies) and cookies which are used to create a pseudonymised user profile (so-called tracking cookies).

The processing of functional cookies is necessary to enable you to visit the website (Art. 6 (1) point (b) GDPR).

For more information about our cookies, please see the following.

<b>cookie name</b>	<b>purpose</b>	<b>storage duration</b>	<b>type of cookie</b>
identity-kit-access-token	The cookie allows the access to the profile data.	1 hour	permanent or protocol cookie
identity-kit-access-token-expiration	The cookie defines how long the access token is valid.	session	session cookie
identity-kit-id-refresh-token	The cookie is used to refresh the access token when it expires.	session	session cookie
identity-kit-id-state	These cookies are unique identifiers to protect the user from CSRF attacks.	session	session cookie
identity-kit-id-token	The cookie is to identify the user.	session	session cookie
identity-kit-user-email	The cookie is to store the user email address, which is needed for certain operations in the Volkswagen ID Portal.	session	session cookie
referrer-location	The cookie is to temporarily store the target url of the user so that s/he gets redirected there after the authentication.	session	session cookie

### III. Registration and use of the Volkswagen ID

1. To create a Volkswagen ID, you must register with an e-mail address and a password. Your personal data is collected by Volkswagen AG via the Volkswagen ID application. To verify your registration for the Volkswagen ID, we use the so-called double opt-in procedure. An e-mail is sent to the given e-mail address with a request for confirmation. Processing takes place for the purpose of performance of the contract (provision of the Volkswagen ID service, Art. 6 (1) point (b) GDPR).
2. In addition to the required input of e-mail address and password, you may voluntarily enter further personal data in the Volkswagen ID, which we will then store in your Volkswagen ID so that this data can be transmitted with your express and separate consent to services you register for with your Volkswagen ID (cf. B. III.3.):
  - Name,
  - Form of address and title,
  - Date of birth,
  - Address,

- Phone numbers,
- Preferred language,
- Profile photo.

To the extent you do not provide this additional information or you provide inaccurate information, you might not be able to use other digital services in connection with your Volkswagen ID, if the information is necessary for the use of such other digital service. However, your ability to create a Volkswagen ID will not be affected.

This data is stored in the Volkswagen ID for the performance of the contract (provision of the 'Volkswagen ID' service, Art. 6 (1) point (b) GDPR).

3. You can use your Volkswagen ID to register for various services (e.g. websites or other digital services) provided by us or third parties. When you register for the first time, you will be asked to give your consent (Art. 6 (1) point (a) GDPR) for the processing or transmission of such of your data from your Volkswagen ID that is necessary for the provision of the other services. Should Volkswagen AG provide services on an ongoing basis against payment of a fee and you therefore enter into a continuing obligation, access to the personal data in your Volkswagen ID is based on a contractual basis (Art. 6 (1) point (b) GDPR) after you have granted authorisation to access this data.
4. We will store your personal data as long as your Volkswagen ID exists. If you have not logged into a service with the Volkswagen ID for a period of 5 years, we will delete this Volkswagen ID together with your personal data to the extent we are not obligated to store the data for other reasons.
5. You can delete the entire Volkswagen ID in the "Account settings" menu item. If you do this, we will delete your personal data if and to the extent we are not obligated to store the data for other reasons, according to statutory provisions (in particular commercial or tax law regulations). In that case, the data will be deleted at the latest after this legal reason has ceased to exist. To the extent data is still necessary for the settlement of claims arising from this or other contracts with us, deletion will take place at the earliest after the final conclusion of any such claims.
6. You may also (with the exception of your e-mail address and password) delete all or individual personal data from the Volkswagen ID without deleting the entire Volkswagen ID. However, this does not have any impact on the processing of personal data for the purposes of a service if you have granted the service the right to access it and therefore personal data has already been transmitted to the service. The processing of your data connected to the particular service is subject to the privacy policy for that service.
7. In addition, you may withdraw your consent to access to your personal data for some or all of the services you registered for with your Volkswagen ID. If Volkswagen AG provides services continuously against payment of a fee, the withdrawal of the right to access data may be made dependent on the prior termination of the contract for the provision of the services; this limitation does not apply to services provided by third parties. Withdrawal of your consent to access to data is only effective for the future. Data transmitted to the service during your use of a service may be further processed by the relevant service. You can find information on this in the privacy policy of the service. You can get an overview of the services you registered for with your Volkswagen ID in your Volkswagen ID Portal. Through the Volkswagen ID Portal, you can also manage the accesses you have granted.

#### **IV. Dialogue Center (Customer Service)**

1. You may contact our Dialogue Center by e-mail or telephone. When you contact our Dialogue Center, the information and data you provide (including personal data) is digitally captured in order to process your request. If you do not provide this information we may not be able to process your request.
2. If you contact our Dialogue Center by telephone, we will request at least the following data: last name, first name, e-mail address, telephone number, place of residence (country) and language.
3. If you contact our Dialogue Center by e-mail, we will request at least the following data: E-mail address, place of residence (country) and language.
4. Depending on your request, we may ask for additional information. This may include:
  - Data about your smartphone (operating system and operating system version),
  - Data about your browser (browser and browser version),
  - Data on the use of the Volkswagen ID (set language),
  - Data on your vehicle (vehicle identification number (VIN)),
  - Information about your request (What is the problem? How did the problem occur? What impact does the problem have? Does the problem occur repeatedly or has it happened only once? Since when does the problem occur?).
5. We process your personal data for the provision of customer service for the purpose of the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract (Article 6 (1) point (b) GDPR).
6. We will only keep your data as long as necessary for the respective stated purposes for which the data was collected. The particular retention period can vary between three months (e.g. for simple questions or complaints) over five years (e.g. for claims indicating a dispute) up to ten years (e.g. in cases of claims for damages in conjunction with so-called manufacturer certificates).

## **V. Processing for the purpose of advertising by Volkswagen AG**

In order for you to receive personalised advertising from us via e-mail and/or telephone, you may consent to the processing of your personal data for this purpose (Article 6 (1) point (a) GDPR). After obtaining consent, we will process the following data:

- Private contact and identification data (e.g. last name, first name, e-mail address, telephone number)
- Transaction data (for example, completed parking processes)
- Vehicle usage data (e.g. logbook, liquid levels)
- Contract data (e.g. vehicle equipment, current contracts about services)
- IT usage data (e.g. last logins to services)
- Campaign data (e.g. time from the dispatch of the last campaign)

We will process this data for the following purposes:

- Market research and personally tailored advertising for existing and new products (e.g. digital products),
- Discount campaigns,
- Service and loyalty programs,
- Dispatch of customer magazines (this includes, for example, information on automobiles and automobile-related products and services, including notifications about technical

innovations, digital products and services for your vehicle (e.g. Volkswagen Connect), accessories, customer and product events, trade fairs and other events).

In order to better adapt the content of our e-mails to your needs, we also process your personal data on your usage behaviour in receiving advertising and market research (opening the e-mail and links in the e-mail) based on your consent (Article 6 (1) point (a) GDPR). Opening links or advertisements from a specific area is detected and saved. We use this information to determine which topics maybe of interest to you. On this basis you will receive advertising better tailored to your usage behaviour in the future.

If you withdraw your consent, we will no longer process your personal data for the purpose of advertising and market research. You can withdraw your consent by clicking on the "unsubscribe" link contained in the messages sent by us or e-mail to [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de). You can also withdraw your consent directly in your Volkswagen ID portal. If you withdraw your consent, we will no longer process your personal data for the purpose of advertising.

We will also no longer process your personal data for such purposes if we have not contacted you for advertising purposes for one year.

## **VI. Processing for the purposes of advertising by the national sales company (importer) responsible for your country\***

*\*This section does not apply to people permanently resident in Germany*

If you wish to receive advertising personally tailored to you from the national sales company (importer) responsible for your country, you must consent to the processing of your data for this purpose (Article 6, paragraph 1, letter a GDPR). If you give your consent, Volkswagen AG processes personal data from the Volkswagen ID user account and associated services. The following data is processed once you have given your consent:

- Private contact and identification data (e.g. surname, first name, email address, telephone number)
- Personal details (such as preferred partners)
- Transaction data (e.g. parking sessions completed)
- Vehicle data (e.g. built-in navigation system in stored vehicles)
- Vehicle usage data (e.g. logbook, fill levels)
- Contract data (e.g. ongoing contracts with associated services)
- IT usage data (e.g. last logins to services, use of functions)
- Campaign data (e.g. time and content of recent campaign delivery)

This data is processed for the following purposes:

Surveys and personally tailored advertising such as information, offers, discounts on new and existing products from the national sales company (importer) responsible for your country (e.g. vehicles and vehicle-related products), products from Volkswagen Group Charging GmbH (e.g. the Elli charging card) and products from national subsidiaries of Volkswagen Financial Services AG (e.g. leasing) and information on and invitations to service and loyalty programmes, delivery of customer magazines, customer and product events (e.g. test drives, product launches, product demonstrations), trade fairs and events. In order to improve its advertising, Volkswagen AG pseudonymises and segments the personal data stored in your Volkswagen ID user account and associated services. If you have consented to advertising (Article 6, paragraph 1, letter a GDPR), Volkswagen AG uses the results of segmentation and makes a direct personal link with the data mentioned above. For more information on the pseudonymisation and segmentation of your data, please see the section 'Segmentation for the purposes of advertising optimisation' in the Privacy Policy for the service you are using. You can find services you use and which are linked to the

Volkswagen ID user account at any time in the Volkswagen ID portal <https://vwid.vwgroup.io> under the menu option 'Connected apps'.

For the purposes of approaches by the national sales company (importer) responsible for your country, Volkswagen AG transfers relevant data (e.g. contact information) and results of relevant segmentation to the national sales company (importer) responsible for your country. The national sales company (importer) responsible for your country processes this data and results of segmentation at its own responsibility. The national sales company (importer) responsible for your country will contact you using the contact information available via message (email, SMS, in-app, push) and by telephone. If you are permanently resident in Poland or Belgium, the national sales company (importer) responsible for your country will contact you for these purposes using the contact information available via your selected channels, such as by email and/or telephone. You can view the national sales company (importer) responsible for your country at the following link: <https://connectgo.volkswagen-we.com/importer/#load/layer/importer>.

To tailor advertising to you personally, Volkswagen AG and the national sales company (importer) responsible for your country process data regarding your usage behaviour in the context of advertising delivery (e.g. opening emails and links within emails). Volkswagen AG processes this data to ensure that segmentation is highly relevant. The national sales company (importer) responsible for your country processes this data to ensure content is highly relevant. This is used as a basis to ensure you receive advertising better suited to your needs in future (e.g. if you click on links/advertising in a particular section of an email, you will receive more emails on this topic).

You may of course withdraw your consent to advertising (Article 6, paragraph 1, letter a GDPR) with respect to the national sales company (importer) responsible for your country at any time, without giving reasons, with immediate effect for the future, e.g. by sending an email to the email address in the consent declaration, via the withdrawal link contained in the messages or by contacting Volkswagen AG, e.g. by email to [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de), via the contact details stated in the Site notice or in the Volkswagen ID user account. If you withdraw your consent, Volkswagen AG and the national sales company (importer) responsible for your country will no longer process your personal data for advertising purposes. However, said withdrawal does not affect the lawfulness of data processing prior to withdrawal. Volkswagen AG will also no longer process your personal data for advertising purposes if you have not been contacted for advertising purposes for a year. Volkswagen AG deletes your data after three years or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations.

## **VII Processing for the purposes of advertising from Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG\***

*\* This section only applies to people permanently resident in Germany*

If you wish to receive advertising personally tailored to you from Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG, you must consent to the processing of your data for this purpose (Article 6, paragraph 1, letter a GDPR). If you give your consent, Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG process personal data from the Volkswagen ID user account and associated services. The following data is processed once you have given your consent:

- Private contact and identification data (e.g. surname, first name, email address, telephone number)
- Personal details (such as preferred partners)
- Transaction data (e.g. parking sessions completed)
- Vehicle data (e.g. built-in navigation system in stored vehicles)
- Vehicle usage data (e.g. logbook, fill levels)

- Contract data (e.g. ongoing contracts with associated services)
- IT usage data (e.g. last logins to services, use of functions)
- Campaign data (e.g. time and content of recent campaign delivery)

This data is processed for the following purposes:

Surveys and personally tailored advertising such as information, offers, discounts on new and existing products from Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG (e.g. We services, vehicles and vehicle-related products), products from Volkswagen Group Charging GmbH (e.g. the Elli charging card), products from Mobility Trader GmbH (e.g. used vehicles), products from Urban Mobility International GmbH (e.g. WeShare) and products from national subsidiaries of Volkswagen Financial Services AG (e.g. leasing) and information on and invitations to service and loyalty programmes, delivery of customer magazines, customer and product events (e.g. test drives, product launches, product demonstrations), trade fairs and events. Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG will contact you for these purposes using the contact information available via message (email, SMS, in-app, push) and by telephone.

In order to improve their advertising, Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG pseudonymise and segment the personal data stored in your Volkswagen ID user account and associated services and share joint responsibility for this. If you have consented to advertising (Article 6, paragraph 1, letter a GDPR), Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG use the results of segmentation and make a direct personal link with the data mentioned above. For more information on the pseudonymisation and segmentation of your data, please see the section 'Segmentation for the purposes of advertising optimisation' in the Privacy Policy for the service you are using. You can find services you use and which are linked to the Volkswagen ID user account at any time in the Volkswagen ID portal <https://vwid.vwgroup.io> under the menu option 'Connected apps'. To tailor advertising to you personally, Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG process data regarding your usage behaviour in the context of advertising delivery (e.g. opening emails and links within emails). This is used as a basis to ensure you receive advertising better suited to your needs in future (e.g. if you click on links/advertising in a particular section of an email, you will receive more emails on this topic).

You may of course withdraw your consent to advertising (Article 6, paragraph 1, letter a GDPR) with respect to Volkswagen AG or Volkswagen Deutschland GmbH & Co. KG at any time, without giving reasons, with immediate effect for the future, e.g. by sending an email to [info-datenschutz@volkswagen.de](mailto:info-datenschutz@volkswagen.de), via the withdrawal link contained in the messages, via the contact details stated in the Site notice or in the Volkswagen ID user account. If you withdraw your consent, Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG will no longer process your personal data for advertising purposes. However, said withdrawal does not affect the lawfulness of data processing prior to withdrawal. Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG will also no longer process your personal data for advertising purposes if you have not been contacted for advertising purposes for a year. Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG delete your data after three years or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations.

## **VIII. General information on the analysis of data from Volkswagen ID\***

*\* This section does not apply to people permanently resident in Germany*

Volkswagen AG is constantly striving to develop new products and services, improve the products and services it provides and optimise advertising for the purposes of marketing said products and services. Sound evaluation of the use of current products and services (analytics) is required for this purpose. Accordingly, Volkswagen AG processes data from the Volkswagen ID user account and associated services, such as



- Pseudonymous identification data (e.g. a randomly generated pseudonymous user ID)
- User account data (such as preferred partners)
- Transaction data (e.g. completed appointment scheduling)
- Vehicle usage data (e.g. logbook, fill levels)
- Contract data (e.g. vehicle equipment, ongoing contracts with associated services)
- IT usage data (e.g. last logins to services, use of functions)
- Location data (e.g. truncated GPS data)

The purposes and nature of processing and the legal basis thereof are described in detail below.

### **1. Analysis for the purposes of developing and improving products**

Volkswagen AG processes data from Volkswagen ID user account for the purposes of developing new products and services (by estimating adoption rates for new products, for example) and improving existing ones (such as by evaluating adoption rates for existing products). For stored vehicles, Volkswagen AG processes the vehicle identification number and adds further equipment data for your vehicle to the above data. Your personal data is pseudonymised as part of processing. Pseudonymisation involves the removal of all direct personal identifiers (e.g. name, email, telephone number, vehicle identification number). Indirectly traceable identifiers (pseudonyms) are retained. Data is only analysed in Volkswagen AG's analytics systems once this pseudonymisation has taken place. The direct personal link is not restored at any time. The results of the analytics (particularly metrics and figures) are completely anonymous. Processing of pseudonymous data is required as there are interactions between the Volkswagen ID user account and the relevant services. In these circumstances, the use of the pseudonym is absolutely essential in establishing a connection between the data underpinning the analysis from the Volkswagen ID user account and from the associated services. Your data is processed as described on the basis of the legitimate interest of Volkswagen AG in offering you new and improved products and services (Article 6, paragraph 1, letter f GDPR). Volkswagen AG deletes your pseudonymised data after five years or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations. For more information on the pseudonymisation and analysis of your data, please see the section 'Analysis for the purposes of developing and improving products' in the Privacy Policy for the service you are using. You can find services you use and which are connected to the Volkswagen ID user account at any time in the Volkswagen ID portal <https://vwid.vwgroup.io> under the menu option 'Connected apps'.

### **2. Segmentation for the purposes of advertising optimisation\***

*\*This section does not apply to people permanently resident in Argentina, India and Ukraine.*

Volkswagen AG processes data from the Volkswagen ID user account for the purposes of advertising optimisation (e.g. evaluating relevance for a campaign). For stored vehicles, Volkswagen AG processes the vehicle identification number and adds further equipment data for your vehicle to the above data. Your personal data is pseudonymised as part of processing. Pseudonymisation involves the removal of all direct personal identifiers (e.g. name, email, telephone number, vehicle identification number). Indirectly traceable identifiers (pseudonyms) are retained. Data is only segmented in Volkswagen AG's analytics systems once this pseudonymisation has taken place.

Your data is processed as described based on Volkswagen AG's legitimate interest in providing optimised advertising tailored to the user (Article 6, paragraph 1, letter f GDPR). Volkswagen AG deletes your pseudonymised data after three years or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations.



Volkswagen AG does not use the results to restore a direct personal link if you have not given appropriate consent to advertising (Article 6, paragraph 1, letter a GDPR). For more information on consenting to advertising from Volkswagen AG, please see the passage 'Processing for the purposes of advertising'. For more information on consenting to advertising from the national sales company (importer) responsible for your country, please see the passage 'Processing for the purposes of advertising by the national sales company (importer) responsible for your country'.

For more information on the pseudonymisation and segmentation of your data, please see the section 'Segmentation for the purposes of advertising optimisation' in the Privacy Policy for the service you are using. You can find services you use and which are connected to the Volkswagen ID user account at any time in the Volkswagen ID portal <https://vwid.vwgroup.io> under the menu option 'Connected apps'.

## **IX. General information on the analysis of data from Volkswagen ID\***

*\* This section only applies to people permanently resident in Germany*

Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG are constantly striving to develop new products and services, improve the products and services they provide and optimise advertising for the purposes of marketing said products and services. Sound evaluation of the use of current products and services (analytics) is required for this purpose. Accordingly, Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG process data from the Volkswagen ID user account and associated services as joint controllers, such as

- Pseudonymous identification data (e.g. a randomly generated pseudonymous user ID)
- User account data (such as preferred partners)
- Transaction data (e.g. completed appointment scheduling)
- Vehicle usage data (e.g. logbook, fill levels)
- Contract data (e.g. vehicle equipment, ongoing contracts with associated services)
- IT usage data (e.g. last logins to services, use of functions)
- Location data (e.g. truncated GPS data)

The purposes and nature of processing and the legal basis thereof are described in detail below.

### **1. Analysis for the purposes of developing and improving products**

Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG process data from the Volkswagen ID user account for the purposes of developing new products and services (by estimating adoption rates for new products, for example) and improving existing ones (such as by evaluating adoption rates for existing products). For stored vehicles, Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG process the vehicle identification number and add further equipment data for your vehicle to the above data. Your personal data is pseudonymised as part of processing. Pseudonymisation involves the removal of all direct personal identifiers (e.g. name, email, telephone number, vehicle identification number). Indirectly traceable identifiers (pseudonyms) are retained. Data is only analysed in Volkswagen AG's analytics systems once this pseudonymisation has taken place. The direct personal link is not restored at any time. The results of the analytics (particularly metrics and figures) are completely anonymous. Processing of pseudonymous data is required as there are interactions between the Volkswagen ID user account and the relevant services. In these circumstances, the use of the pseudonym is absolutely essential in establishing a connection between the data underpinning the analysis from the Volkswagen ID user account and from the associated services.

Your data is processed as described on the basis of the legitimate interest of Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG in offering you new and improved products and services (Article 6, paragraph 1, letter f GDPR).

Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG delete your pseudonymised data after five years or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations. For more information on the pseudonymisation and analysis of your data, please see the section 'Analysis for the purposes of developing and improving products' in the Privacy Policy for the service you are using. You can find services you use and which are connected to the Volkswagen ID user account at any time in the Volkswagen ID portal <https://vwid.vwgroup.io> under the menu option 'Connected apps'.

## **2. Segmentation for the purposes of advertising optimisation**

Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG process data from the Volkswagen ID user account for the purposes of advertising optimisation (e.g. evaluating relevance for a campaign). For stored vehicles, Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG process the vehicle identification number and add further equipment data for your vehicle to the above data. Your personal data is pseudonymised as part of processing. Pseudonymisation involves the removal of all direct personal identifiers (e.g. name, email, telephone number, vehicle identification number). Indirectly traceable identifiers (pseudonyms) are retained. Data is only segmented in Volkswagen AG's analytics systems once this pseudonymisation has taken place. Your data is processed as described based on Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG's legitimate interest in providing optimised advertising tailored to the user (Article 6, paragraph 1, letter f GDPR).

Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG delete your pseudonymised data after three years or in accordance with legal requirements, for instance, once the purpose for which it was collected becomes invalid and if deletion is not contrary to any other retention obligations. Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG do not use the results to restore a direct personal link if you have not given appropriate consent to advertising (Article 6, paragraph 1, letter a GDPR).

For more information on consenting to advertising from Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG, please see the passage 'Processing for the purposes of advertising from Volkswagen AG and Volkswagen Deutschland GmbH & Co. KG'.

For more information on the pseudonymisation and segmentation of your data, please see the section 'Segmentation for the purposes of advertising optimisation' in the Privacy Policy for the service you are using. You can find services you use and which are connected to the Volkswagen ID user account at any time in the Volkswagen ID portal <https://vwid.vwgroup.io> under the menu option 'Connected apps'.

## **X. Compliance with statutory and regulatory requirements**

In the case of direct sales and the provision of digital services, we process your personal data (first name, last name, address, country) for the purposes of preventing fraud and money laundering, of preventing, combating and resolving terrorist financing and property crimes, as well as for comparison with European and international anti-terror lists. Volkswagen AG is required to do so in particular under statutory obligations (such as the Anti-Money Laundering Act or the European embargo and terrorism regulations). Under certain circumstances, Volkswagen AG has a legitimate interest in observing and complying with obligations imposed by public and other competent

government authorities - within or outside your country of residence - in order not to expose Volkswagen AG and its representatives to criminal or civil sanctions.

The legal basis for the processing of your personal data for the stated purposes is Article 6 (1) point (c) GDPR in the case of statutory obligations or Article 6 (1) point (f) GDPR in the case of a legitimate interest.

For reasons of our fiscal and legal commercial retention obligations we store your personal data provided usually for seven years after contract fulfilment, but – if legally required – we may store your data up to a maximum of 30 years after collecting the data in order to comply with our legal obligations.

## **XI. Recipients of your personal data and transfer to third countries**

If you use your Volkswagen ID to log into a service which is not provided by us, but by a third party, this third party will only be transferred the personal data from your Volkswagen ID to whose transfer you consented when you first logged into this service.

We commission service providers to facilitate use of Volkswagen ID and associated services. These service providers are contractually obliged to comply with provisions of data protection law and are not considered third parties as defined by data protection law. Personal data is only passed on to third parties if this is required for contract processing, particularly for providing services.

In the context of using Volkswagen ID, your personal data is processed in an Amazon Web Services cloud operated by Amazon Web Services EMEA SARL ('Amazon') in the European Union. It is not possible to rule out Amazon Web Services, Inc. with headquarters in the US, having access to the personal data, so corresponding EU standard contractual clauses (a contractual arrangement approved by the European Commission according personal data the same protection for data processing in non-EU countries as in the EU) have been concluded. Amazon processes your data exclusively on our behalf and in accordance with our instructions as part of a contract data processing agreement. For the purposes of ensuring smooth operation and development, Volkswagen AG also uses Volkswagen car.SW Org Wolfsburg AG and Hexad GmbH, both with headquarters in Germany, as processors.

Your personal data is processed for the purposes of advertising optimisation and improving products in an Amazon Web Services cloud operated by Amazon Web Services EMEA SARL ('Amazon') in the European Union. It is not possible to rule out Amazon Web Services, Inc. with headquarters in the US, having access to the personal data, so corresponding EU standard contractual clauses (a contractual arrangement approved by the European Commission according personal data the same protection for data processing in non-EU countries as in the EU) have been concluded. Amazon processes your data exclusively on our behalf and in accordance with our instructions as part of a contract data processing agreement. For the purposes of ensuring smooth operation and development, Volkswagen AG also uses Volkswagen car.SW Org Wolfsburg AG, Adatastra GmbH and Deloitte Consulting GmbH, all with headquarters in Germany, as processors.

In the context of the Customer Interaction Centre (Customer Care) and communication, your personal data is processed in a cloud operated by Salesforce.com EMEA Limited ('Salesforce') in the European Union. It is not possible to rule out Sales-force.com, Inc. with headquarters in the US, having access to the information, so corresponding EU standard contractual clauses (a contractual arrangement approved by the European commission according personal data the same protection for data processing in non-EU countries as in the EU) have been concluded. The data processed is also protected by BCR (Binding Corporate Rules) of Salesforce. Salesforce processes your data exclusively on our behalf and in accordance with our instructions as part of a contract data processing agreement. For the purposes of ensuring smooth operation and development,

Volkswagen AG also uses Volkswagen car.SW Org Wolfsburg AG, with headquarters in Germany, as a processor.

Personal data is only disclosed for the purposes of advertising from the national sales company (importer) responsible for your country if you consent to the processing of your data for this purpose. In principle, your personal data is only transferred from Volkswagen AG to the national sales company (importer) responsible for your country in encrypted form. If the national sales company (importer) responsible for your country is in a country outside the European Union and the European Economic Area, we transfer your data to what are known as 'third countries' under the GDPR. There may therefore be a lower level of protection for your personal data. To protect your data, Volkswagen AG and the national sales company (importer) have concluded EU standard agreements. You can view the national sales company (importer) responsible for your country at the following link: <https://connectgo.volkswagen-we.com/importer/#load/layer/importer>.

You can view the EU standard contractual clauses used at the following link: <https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32010D0087>

## **XII. Data Retention**

1. In general, we will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
2. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
3. Specific information about data retention in connection with the single purposes of data processing can be found in the corresponding Sections above.

## **C. Your rights**

You may assert the following rights towards Volkswagen AG at any time free of charge. We will need to verify your identity in such circumstances and may request more information or clarifications from you if needed to help us locate and provide you with the personal data requested.

You can find further information on the exercise of your rights on the website <https://datenschutz.volkswagen.de/?lang=en>.

**Right of access:** You have the right to obtain confirmation as to whether personal data concerning you are being processed by us and if so, which personal data concerning you is processed by us and to learn which third parties domestic or abroad your personal data has been transferred to. Furthermore, you have the right to obtain a copy of the personal data undergoing processing by us.

**Right to rectification:** You have the right to obtain rectification of any inaccurate or completion of any incomplete personal data concerning you. You can also request that your data be corrected accordingly by third parties to whom we have transferred this data.

**Right to erasure:** You have the right to obtain the erasure of your personal data if the conditions specified in Article 17 GDPR are met. Accordingly, you may obtain the erasure of your data, for instance, if it is no longer necessary for the purposes for which it was collected. Furthermore, you may obtain erasure if we process your data on the basis of your consent and you withdraw this consent. You can also request that your data be erased accordingly by third parties to whom we have transferred this data.

**Right to restriction of processing:** You have the right to obtain the restriction of the processing of your data if the requirements of Article 18 GDPR are met. This is the case, for example, if you contest the accuracy of your data. For the duration of the verification of the accuracy of the data you can then obtain the restriction of the processing.

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**Right to object:** You have the right to object to the processing of your personal data in the following cases:

- If the processing is for direct marketing purposes, including profiling related to direct marketing.
  - If the processing, including profiling, is based on the following legal grounds:
  - necessary for us to perform a task in the public interest under Article 6 (1) point (e); or
  - necessary for the data controller's or a third party's legitimate interests under Article 6 (1) point (f) and if we are not able to demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. In case of such objection, we kindly ask you to state the reasons for objecting to the data processing.
- 

**Right to data portability:** If data processing is based on consent or contract performance and, in addition, is carried out by automated means, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit it to another controller. Furthermore, you have the right to have the personal data transmitted directly from us to another controller, where technically feasible.

**Right to withdrawal:** If data processing is based on your consent, you have the right to withdraw your consent at any time and free of charge, with effect for the future, via [info-datenschutz@volkswagen.de](mailto:datenschutz@volkswagen.de), via the contact details given in the imprint or via the Volkswagen ID Portal and such other methods as we may inform you from time to time.

**Right to lodge a complaint:** You also have the right to lodge a complaint with a supervisory authority or other applicable privacy regulator about our processing of your data. This can be for example the data protection authority in your country of residence. A list with all data protection authorities in the European Union can be found here: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

## **D. Your contact person**

### **Data protection officer**

Our data protection officer is available to you as a contact person for all data protection-related concerns and for exercising your rights under Section C above. We will inquire into any concerns you have and respond to your requests regarding your rights under data protection law to you in writing within one month of receipt of the request. That period may be extended by us two further months where necessary, taking into account the complexity and number of the requests. We will inform you of any such extension within one month of receipt of the request, together with the

reasons for the delay. Where you make the request by electronic form means, the information will be provided by electronic means where possible, unless otherwise requested by you. If you are not satisfied with our response, you can exercise your right to lodge a complaint referred to in Section C above.

Please direct your inquiries to:

Volkswagen data protection officer

AG Berliner Ring 2, 38440 Wolfsburg, Germany

[datenschutz@volkswagen.de](mailto:datenschutz@volkswagen.de)

Status: 2021 [Download](#)

## Part II

### A. Argentina

#### I. Applicable law

The processing of personal data of Argentine users in connection with the use of Volkswagen ID will be subject to the provisions of Argentine Personal Data Protection Law No. 25,326 and complimentary regulations (" **PDPL**").

#### II. Processing of your personal data.

**Legal basis:** In deviation from the legal bases described in Part I, the legal basis for processing personal data under the law of Argentina is the data subjects' prior, express and informed consent. The consent of the data subjects is given by registering for the Volkswagen ID, after they have expressly confirmed that they have read and accepted the Privacy Policy. Therefore, if You do not agree with this Privacy Policy please leave the Volkswagen ID website and refrain from registering for the Volkswagen ID.

#### III. Recipients of your personal data and transfer to third countries

If you use your Volkswagen ID to register for a service which is not provided by us but by a third party, we will only transmit personal data from your Volkswagen ID to such third party, if and to the extent you have given prior consent to the transmission during the initial registration for such service. We commission service providers in connection with the processing of your requests and your use of the Volkswagen ID and the associated services. These service providers are contractually obligated to comply with data protection regulations and are not considered third parties under data protection law. We only transmit personal data to third parties to the extent necessary for the performance of the contract, in particular for providing the services.

We only transmit personal data for purposes of advertising and market research if you consent to the processing of your data for this purpose.

The personal data we process in connection with your use of the Volkswagen ID is stored in an Amazon Web Services cloud operated by Amazon Web Services EMEA SARL ("Amazon"). Access to the personal data by Amazon Web Services, Inc. based in the USA cannot be ruled out, and we have therefore concluded standard contractual clauses (an agreement which gives personal data the same protection it has in Argentina for data processing in foreign countries) accordingly. Amazon processes your personal data exclusively on our behalf and according to our instructions

in accordance with a data processing agreement. The processing of your personal data in connection with the Dialogue Center (Customer Service) for the Volkswagen ID and the associated services as well as in connection with advertising communication takes place in a cloud operated by Salesforce.com EMEA Limited ("Salesforce"). Access to the information by Salesforce.com, Inc. based in the USA cannot be ruled out, and we have therefore concluded standard contractual clauses (an agreement which gives personal data the same protection it has in Argentina for data processing in foreign countries) accordingly. Data processed for contractual purposes (such as information regarding changes to our Terms of Use) is also protected by BCR (Binding Corporate Rules) of Salesforce. Salesforce processes your personal data exclusively on our behalf and according to our instructions in accordance with a data processing agreement.

### **III. Your rights**

**Right to update and rectification** : You have the right to obtain the update and rectification of any outdated or inaccurate personal data, or the completion of any incomplete personal data concerning you. You can also request that your data be corrected accordingly by third parties to whom we have transferred this data.

**Right to erasure:** You have the right to obtain the erasure of your personal data if the conditions specified in article 16 of the PDPL are met. Accordingly, you may obtain the erasure of your data, for instance, if it is no longer necessary for the purposes for which it was collected. Furthermore, you may obtain erasure if we process your data on the basis of your consent and you withdraw this consent. You can also request that your data be erased accordingly by third parties to whom we have transferred this data.

**Right to lodge a complaint:** The Agency of Access to Public Information, in its capacity as Controlling Authority of the PDPL, is entitled to receive complaints and claims filed by those affected due to the non-compliance with the applicable personal data protection laws.

### **B. Bosnia and Herzegovina**

In deviation from the legal bases described in Part I, the legal bases for processing personal data under the law of Bosnia and Herzegovina is a consent given by the data subjects. The consent of the data subjects is given by registering for the Volkswagen ID, after they have confirmed that they have read and accepted the Privacy Policy.

#### **Data controller representative in Bosnia and Herzegovina:**

##### **Porsche BH d.o.o. Sarajevo**

BIH-71000 Sarajevo | Bulevar Meše Selimovića br 16

### **C. Brazil**

Brazilian General Data Protection Law no. 13.709/18 (LGPD) applies in full extent to any processing operation carried out in the following circumstances, irrespective of the country in which the controller's headquarter is located:

I – the processing operation is carried out in the Brazilian territory;

II – the purpose of the processing activity is the offer or supply of goods or services or the processing of data of individuals located in the Brazilian territory; or

III – the personal data is collected in the Brazilian territory.



Under the LGPD personal data collected in the Brazilian territory is understood as personal data whose data subject is in the Brazilian territory at the time of the collection.

Deviation from Part I on the topic of Recipients of your personal data and transfer to third countries:

Service providers commissioned in connection with the processing of your requests and your use of the Volkswagen ID and the associated services are considered to be third parties under the LGPD. It means that, if a data subject requests information on how its data is processed, the controller is obligated to inform the type of processing and responsibilities of all parties who carry out the processing.

Deviation from Part I on the topic of Data Subjects' Rights:

**Right to object** – in addition to the general right to object described in Part I of the Privacy Policy, the LGPD provides that data subject has also the right to oppose to processing of his/her data whenever the processing is not in compliance with the provisions of the LGPD and the processing is carried out under any legal basis other than consent.

**Right to data portability** – under the LGPD right of portability has the following meaning: portability of the data to other service providers or suppliers of product, at the express request, and observing the business and industrial secrets, in accordance with the regulation of the controlling body.

Deviation from Part I on the topic of Data Retention:

The personal data shall be eliminated after termination of the processing thereof, within the scope and technical limits of the activities, and conservation thereof shall be authorized for the following purposes:

I - compliance with a statutory or regulatory obligation by the controller;

II – studies by a research body, guaranteeing, whenever possible, the anonymization of personal data;

III - transfer to third parties, upon compliance with the data processing requirements set forth in this Law; or

IV – exclusive use of the controller, provide the data are anonymized, it being understood that the access thereto by third parties is prohibited.

## **D. Chile**

In deviation from the legal bases described in Part I, the legal bases for processing personal data under the law of Chile is an express consent given by the data subjects. The express consent of the data subjects is given by registering for the Volkswagen ID, after they have confirmed that they have read and accepted the Privacy Policy.

**Right to erasure:** You have the right to obtain the erasure of your personal data if the conditions specified in Article 17 GDPR are met, if your personal data is outdated or obsolete, in the event you have provided your data voluntarily or if you have provided your personal data solely with the purpose to receive commercial communications and you do not want to be listed in such register anymore. Accordingly, you may obtain the erasure of your data, for instance, if it is no longer necessary for the purposes for which it was collected. Furthermore, you may obtain erasure if we

process your data on the basis of your consent and you withdraw this consent. You can also request that your data be erased accordingly by third parties to whom we have transferred this data.

**Right to restriction of processing:** You have the right to obtain the restriction of the processing of your data if the requirements of Article 18 GDPR are met, in the event you have provided your data voluntarily and if it was provided solely for commercial communications and you do not want to be listed in such register anymore. This is the case, for example, if you contest the accuracy of your data. For the duration of the verification of the accuracy of the data you can then obtain the restriction of the processing.

## E. India

**Grievance officer:** Our grievance officer is available to you for redressal of all concerns and grievances that you may have in relation to this Privacy Policy. Please direct your concerns /grievances to:

Volkswagen grievance officer / Volkswagen data protection officer

AG Berliner Ring 2, 38440 Wolfsburg, Germany

[datenschutz@volkswagen.de](mailto:datenschutz@volkswagen.de)

## F. Japan

Personal information obtained from residents in Japan ("Personal Data") shall be handled in accordance with the following rules in addition to the rules set forth in Part I of this Privacy Policy.

**1. Purpose :** We will handle the Personal Data in accordance with the Purposes set forth in Part I of this Privacy Policy ("Purposes"), and not use Personal Data for any purpose other than such Purposes. We shall promptly notify the relevant data subjects, or disclose to the public of the Purposes (and any subsequent changes thereof), unless the Purposes have already been disclosed to the public;

**2. Collection :** We will not obtain any Personal Data through any deceptive, fraudulent, or other wrongful means;

**3. Accuracy :** We will make reasonable efforts to ensure that Personal Data handled by us is accurate and up to date and within the scope necessary to achieve the Purposes;

**4. Retention :** We will retain Personal Data in accordance with Section XI of Part I of this Privacy Policy, and cease retention as soon as it is reasonable to assume that the Purposes are no longer being served by retention of Personal Data;

**5. Protection :** We will protect Personal Data in its possession or under its control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, damage, loss or similar risks. We will adequately supervise processing of Personal Data by our officers, employees, third party vendors and any other parties who process Personal Data on our behalf;

**6. Transfer:** Without obtaining the prior consent of the relevant data subjects, we will not transfer or provide any part of Personal Data to any individual or entity unless an exception under the Act on the Protection of Personal Information ("APPI") applies.

**7. Extraterritorial Transfer** : Without obtaining the prior consent of the relevant data subjects, we will not transfer or provide any part of Personal Data to any individual or entity located outside Japan, European Union or the United Kingdom unless (a) a transferee is located in a country or area certified by the Personal Information Protection Commission of Japan ("PPC") as having data protection standards equivalent to those of Japan or (b) the transferee has data protection standards equivalent to the standards specified by the PPC; and,

**8. Data Subject's Right** : If a data subject requests pursuant to the APPI disclosure of Purposes, access to, correction, or deletion of any of Personal Data relevant to such data subject, or lodge a complaint, we will respond to such request or complaint promptly and in accordance with the APPI. Any fee charged to data subjects shall be reasonable.

## **G. México**

### **1. Legal Basis for processing personal data**

In any case, the legal basis for the processing of personal data of Mexican citizens by means of the Volkswagen ID services will be consent. The data subjects grant their free consent by carrying out the registration process within the Volkswagen ID services, once they have read and accepted the Terms of Use and the Privacy Policy previously made available.

### **2. Sensitive personal data**

Within the processing activities of your personal data, the following sensitive personal data will be involved:

- Information arising from national and international sanction lists
- Criminal offenses

We inform you that the processing of such sensitive personal data will be carried out, only with regard to the following purposes:

- Comply with legal obligations arising from the German Anti-Money Laundering Act or the European embargo and terrorism regulations
- Creations and management of customers' profile for the VW ID services
- Identification of the customer
- Using of a shared profile regarding the VW ID services

Volkswagen AG is granted access to these national and international sanctions acts by means of public data bases, same that may be consulted by the data subjects on the following websites:

- [https://www.bafin.de/DE/Aufsicht/Geldwaeschepraevention/Laender\\_und\\_Sanktionslisten/Laender\\_und\\_Sanktionslisten\\_node.html](https://www.bafin.de/DE/Aufsicht/Geldwaeschepraevention/Laender_und_Sanktionslisten/Laender_und_Sanktionslisten_node.html)
- [https://eas.europa.eu/topics/sanctions-policy/8442/consolidated-list-of-sanctions\\_en.htm](https://eas.europa.eu/topics/sanctions-policy/8442/consolidated-list-of-sanctions_en.htm)

### **3. Transfer of personal data**

<b>Third Party Recipients</b>	<b>Items of Personal Data Provided</b>	<b>Purposes for using Personal Data</b>
Amazon Web Services EMEA	-The personal data we process in connection with your use of the Volkswagen ID -The personal data we analyze for developing and	-Providing the services of Volkswagen ID -Developing and

SARL	<p>improving products and services</p> <ul style="list-style-type: none"> <li>-The personal data we segment for improving advertising</li> <li>-The personal data we process in connection with the Customer Interaction Center (Customer Service) for the Volkswagen ID</li> </ul>	<p>improving products and services</p> <ul style="list-style-type: none"> <li>-Improving campaigns</li> <li>-Providing the Customer Interaction Center (Customer Service)</li> </ul>
Salesforce.com EMEA Limited	<ul style="list-style-type: none"> <li>-The personal data we process for the purpose of advertising by Volkswagen AG and advertising by the importer</li> </ul>	<ul style="list-style-type: none"> <li>-Advertising by Volkswagen AG</li> <li>-Advertising by the Importer</li> <li>-Providing the services of Volkswagen ID</li> </ul>
Hexad GmbH	<ul style="list-style-type: none"> <li>-The personal data we process in connection with your use of the Volkswagen ID</li> <li>-The personal data we analyze for developing and improving products and services</li> <li>-The personal data we segment for improving advertising</li> </ul>	<ul style="list-style-type: none"> <li>-Maintenance of the services of Volkswagen ID</li> <li>-Developing and improving products and services</li> <li>-Support regarding customer requests</li> </ul>
Volkswagen car.SW Org Wolfsburg AG	<ul style="list-style-type: none"> <li>-The personal data we process in connection with your use of the Volkswagen ID</li> <li>-The personal data we analyze for developing and improving products and services</li> <li>-The personal data we segment for improving advertising</li> </ul>	<ul style="list-style-type: none"> <li>-Providing the services of Volkswagen ID</li> <li>-Developing and improving products, advertisement and services</li> </ul>

#### 4. ARCO Rights

You have the right to know which personal data is processed by Volkswagen, as well as the purposes and conditions for processing (Access Right). Also, it is your right to request the rectifications or modifications of your personal data in case it is not updated, inaccurate or incomplete (Rectification Right); to eliminate your personal data from our record and data bases when you consider that it is not being processed in accordance with the principles, duties and obligations foreseen in the Mexican Privacy Law (Cancellation/Deletion Right), as well as to oppose the processing of your personal data for specific purposes (Opposition Right). These rights are commonly known as ARCO Rights.

To exercise your ARCO Rights, you shall send a written document to Volkswagen AG Berliner Ring 2, 38440 Wolfsburg, Germany or per e-mail to [Proteccion.DatosPersonales@volkswagen.de](mailto:Proteccion.DatosPersonales@volkswagen.de) with at least the following information:

1. Name, last name and indicating a communication channel to receive notifications;
2. Copy of your official identification;
3. In case the ARCO right is exercised by a legal representative, it is mandatory to prove the legal personality of the signing person;
4. Explicitly inform Volkswagen about the ARCO right you would like to exercise;
5. Personal data which will be subject to the ARCO right exercised;
6. Any other information helping Volkswagen to find your personal data.

In case your request does not comply with the information established in points I or II herein, it will be considered as not submitted.

Data subjects requests will be managed and answered pursuant to Article 32 of the Mexican Privacy Law, therefore, once your request has been received, we will inform you about the admission or rejection within the following 20 days and will make the resolution effective within the next 15 days, after the admission has been notified. In case your request does not comply with all of the requirements established herein (except items I or II) within the first 5 days after receiving your request, Volkswagen will be entitled to submit an information request in order to comply with all the requirements. In this case, you will be given 10 days to comply with such a requirement, otherwise, your request will be considered as not submitted.

In case you don't receive any answer or feedback from Volkswagen in accordance with the procedure previously established, you will have the right to file a complaint against Volkswagen before the Mexican Data Protection Authority (INAI). For further information, please visit the website [www.inai.org.mx](http://www.inai.org.mx) For further information regarding the process to exercise your ARCO rights, please get in touch with our Privacy Department by means of the email [Proteccion.DatosPersonales@volkswagen.de](mailto:Proteccion.DatosPersonales@volkswagen.de).

## J. South Africa

**Compulsory to provide your personal data:** In order for you to access certain services, it is compulsory for you to provide us with certain personal data. If the provision of personal data is compulsory for receipt or access to a service, then you will not be able to access and/or make full use of the service until you have provided us with the personal data.

**The definition of data subjects:** In the context of South Africa, a "data subject" refers to any "person" to whom personal data relates. A person, for the purposes of South Africa, means "a natural person or a juristic person". Accordingly, all references to data subject in this Privacy Policy refers to both natural persons and juristic persons, where the data subject is located in South Africa.

**Transfer of personal information to third parties located outside of South Africa :** We may, from time to time, need to transfer to and/or store your personal data on servers in a jurisdiction other than where it was collected, and we hereby notify you that such jurisdiction may not have comparable data protection legislation.

**Your right to lodge a complaint:** When the Protection of Personal Information Act, 2013 (" **POPIA**") becomes of force and effect, you will have a right to lodge a complaint to the Information Regulator ([infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)) for any contravention of POPIA.

## K. Switzerland

The provisions contained in Part I apply to you as a Swiss customer – being this an individual or a legal entity – without restriction, unless otherwise agreed below on the basis of the Swiss Federal Act on Data Protection (FADP).

1. When Part I speaks of a "legitimate interest", we mean our overriding private interest in processing your data in connection with the conclusion or performance of our services under the Volkswagen ID (Art. 13 para. 2 lit. a FADP).
2. When Part I speaks of your "consent", we mean your explicit and voluntary consent given on the basis of our adequate information (Art. 4 para. 5 FADP).
3. Certain data processing is subject to the EU standard contractual clauses or protected by the EU-US Privacy Shield and BCR (Binding Corporate Rules) of Salesforce, both of which are

compliant with Swiss data protection law and do extend through the Swiss-US Privacy Shield also to personal data of subjects with permanent residence in Switzerland.

4. You are entitled to the rights mentioned under Part I, with the following amendments:

- Right to erasure: You have the right to obtain the erasure of incorrect data without having to meet certain conditions (Art. 5 para. 2 FADP);
- Right to object: You have the right to object to the processing of your data at any time and without giving reasons (Art. 12 para. 2 lit. b FADP); and

**Right to lodge a complaint** : You have the right to lodge a complaint with the Federal Data Protection and Information Commissioner about our processing of your data, if the methods of processing are capable of breaching the privacy of larger number of persons (system errors; Art. 29 para. 1 lit. a FADP).

## **L. Turkey**

**Right to demand indemnification:** You have the right to demand indemnification in case you suffer damages occurring from the unlawful processing of your personal data.

### **Data controller representative in Turkey:**

Hergüner Bilgen Özeke Avukatlık Ortaklığı, Büyükdere Caddesi 199, Levent 34394, İstanbul  
TÜRKİYE